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December 22, 2005

Stephen E. Johnson, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116
Attention: Chemical Right-to-Know Program

Re: Phthalate Esters Panel HPV Testing Group Test Plans for Phthalate and
Trimellitate Esters; HPV registration number

Dear Administrator Johnson:

The Phthalate Esters Panel HPV Testing Group (Testing Group) of the American Chemistry Council is providing a status update with regard to its commitment to the U.S. EPA High Production Volume Chemical Program. On August 11, 2004, the Testing Group submitted a letter to EPA stating it would include Texanol® Benzyl Phthalate (CAS#16883-83-3) in the test plan for the phthalate esters category (see attached letter).

The Testing Group has completed this task and is submitting a robust summary, IUCLID data file, and an updated phthalate esters category test plan. Additionally, the Testing Group will respond to EPA's comments on the original test plan for the phthalate esters category by the end of the first quarter of 2006.

If you have any questions, please contact me at 703-741-5623 or
Marian_St Stanley@americanchemistry.com.

Sincerely yours,

Marian K. Stanley
Senior Director, American Chemistry Council
Manager, Phthalate Esters Panel

cc: C. Auer, EPA
J. Taylor, EPA
C. Franz, ACC
Phthalate Esters Panel



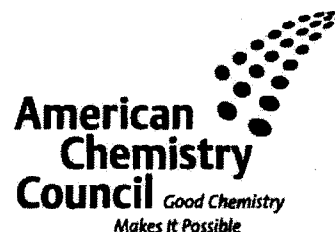
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05 DEC 30 AM 8:39



August 11, 2004

The Honorable Michael O. Leavitt
Administrator
U.S. Environmental Protection Agency
P. O. Box 1473
Merrifield, VA 22116

RE: Phthalate Esters Panel Test Plans for Phthalate and Trimellitate Esters; HPV
registration number

Dear Administrator Leavitt:

In December 2001, the American Chemistry Council's Phthalate Esters Panel HPV Testing Group (HPV Panel) informed EPA that it would no longer sponsor Texanol® Benzyl Phthalate (CAS#16883-83-3) under the HPV Chemical Challenge Program (see attached letter), because Ferro Corporation had informed the HPV Panel that it would sponsor this chemical under the ICCA program. Consequently, the HPV Panel did not include Texanol® Benzyl Phthalate (CAS#16883-83-3) in the test plan for phthalate esters category.

Since that time, Ferro Corporation has removed Texanol® Benzyl Phthalate from the ICCA program. Therefore, the HPV Panel would like to add this chemical back into to the phthalate ester category under the HPV Challenge Program.

The robust summaries for this chemical are now being completed, and the HPV Panel expects to submit them to the Agency by September 1, 2004. A justification for including Texanol® Benzyl Phthalate in the category, and a revised test plan will be included with the robust summaries.

If you have any questions, please contact Marian Stanley, Manager Phthalate Esters Panel, at 703-741-5623 or by e-mail, marian_stanley@americanchemistry.com.

Sincerely yours,

Marian K. Stanley
Senior Director, CHEMSTAR
Manager, Phthalate Esters Panel

cc: C. Auer, EPA
B. Leczynski, EPA
D. Rodier, EPA
S. Russell, ACC
F. McEldowney, ACC
Phthalate Esters Panel